

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Raji Yusuf

Case No. 21-mj-1161

---

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2021 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

18 U.S.C. § 39A

*Offense Description*

On or about June 26, 2021, in the Eastern District of Pennsylvania, the defendant, Raji Yusuf, knowingly aimed a laser pointer at an aircraft or its flight path in the special jurisdiction of the United States, in violation of Title 18, United States Code, Section 39A.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

s/ Christopher Rouchard

*Complainant's signature*

Christopher Rouchard, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 07/13/2021

s/ Hon. Carol S. Wells

*Judge's signature*City and state: Philadelphia, PA

The Hon. Carol S. Wells, U.S. Magistrate Judge

*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**AFFIDAVIT**

I, Christopher Rouchard, being first duly sworn, hereby depose and state as follows:

**A. Introduction and Agent Background**

1. I am currently a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI) and have been since April 2021. Prior to becoming a Special Agent, I was employed as a Financial Analyst with the U.S. Department of Justice, Criminal Division from December 2015 to December 2020. I am currently assigned to the FBI's Joint Terrorism Task Force ("JTTF"), whose primary mission is to investigate matters of international terrorism. I have been involved in the investigation of crimes including false statements and conspiracies to provide material support or resources to designated foreign terrorist organizations, in violation of 18 U.S.C. § 2339B. I have participated in the execution of search warrants and arrest warrants, and the interviews of witnesses and subjects.

2. I make this affidavit in support of a Criminal Complaint and Arrest Warrant against RAJI YUSUF. As set forth below, there is probable cause to believe that RAJI YUSUF has violated Title 18, United States Code, Section 39A, Aiming a Laser Pointer at an Aircraft.

3. Title 18 U.S.C. § 39A states that "[w]hoever knowingly aims the beam of a laser pointer at an aircraft in the special aircraft jurisdiction of the United States, or at the flight path of such an aircraft, shall be fined under this title or imprisoned not more than 5 years, or both." "Special aircraft jurisdiction of the United States" is defined under Title 18 U.S.C. § 31(b) and Title 49 U.S.C. § 46501 to include "any . . . aircraft in flight" if it is an "aircraft in the United States."

4. This affidavit is based on my personal knowledge and information obtained from documents, witnesses, and other law enforcement officials. The information contained in this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant against RAJI YUSUF. As such, this affidavit does not include all of the information that I have acquired while participating in this investigation.

**B. Statement of Probable Cause**

5. On or about June 27, 2021, FBI Philadelphia was advised that RAJI YUSUF had been arrested by Philadelphia Police for shining a laser into the cockpit of a police helicopter. Thereafter, I obtained and reviewed the Philadelphia Police report of arrest, detailing the incident. On or about July 13, 2021, I interviewed the Tactical Flight Officer (“Officer 1”) who had been aboard the helicopter during the incident. Based on the investigation to date, I learned the following.

6. On or about June 26, 2021, two Philadelphia Police Officers were operating a helicopter in the Philadelphia area as part of a regular nightly patrol. Officer 1 advised that at approximately 9:55 p.m., while in flight in the area of Northeast Philadelphia Airport, their helicopter was struck multiple times on the right side with a high intensity green laser. The pilot in command (“Officer 2”) turned the helicopter around to see where the laser was coming from. At that point, the helicopter was struck head on multiple times by a green laser. The laser flashes illuminated the cockpit for approximately 15 seconds, causing Officers 1 and 2 to temporarily see spots in their vision. After regaining normal vision, the Officers pinpointed the source of the laser on the ground in the Roosevelt Mall parking lot near a donut shop. Using the helicopter’s flood light, the Officers saw a male wearing a blue shirt and jeans, later identified as RAJI

YUSUF, with the laser pointer. Officer 1 then used the police radio to call for assistance on the ground.

7. Shortly thereafter, additional Philadelphia Police Officers arrived on the ground at the identified location and saw YUSUF, as described by Officer 1. Initially YUSUF attempted to get inside of his vehicle, but the ground officers stopped and arrested him. One of the officers recovered the laser pointer from the ground near YUSUF and took it into evidence.

8. After being read his Miranda rights, YUSUF signed a document waiving those rights and agreed to speak with Philadelphia detectives. YUSUF admitted that he had a green laser pointer and that he had pointed it at a helicopter multiple times. YUSUF was shown pictures of the recovered laser pointer and advised that it was in fact the laser that he had pointed at the helicopter.

s/ Christopher Rouchard  
\_\_\_\_\_  
Christopher Rouchard, Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me on July 13, 2021

s/ Honorable Carol S. Wells  
\_\_\_\_\_  
THE HONORABLE CAROL S. WELLS  
United States Magistrate Judge  
Eastern District of Pennsylvania